

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**JAPAN DISPLAY INC. and PANASONIC
LIQUID CRYSTAL DISPLAY CO., LTD.,**

Plaintiffs,

V.

**TIANMA MICROELECTRONICS CO.
LTD.,**

Defendant.

JAPAN DISPLAY INC.,

Plaintiff,

V.

**TIANMA MICROELECTRONICS CO.
LTD.,**

Defendant.

JAPAN DISPLAY INC.,

Plaintiff,

V.

**TIANMA MICROELECTRONICS CO.
LTD.,**

Defendant.

JOINT (AGREED) MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Japan Display Inc. (“JDI” or “Plaintiff”) and/or Plaintiff Panasonic Liquid Crystal Display Co. Ltd. (“PLD”) (collectively “Plaintiffs”) and Defendant Tianma Microelectronics Co. Ltd. (“Tianma”) file this Joint (Agreed) Motion for Entry of Protective Order. Having agreed upon

the terms included therein, the parties respectfully request the Court grant this Motion and enter the Proposed Order, attached as Exhibit A.

Dated: February 10, 2021

Respectfully submitted,

<p><u>/s/ Eric J. Klein</u> Eric J. Klein <i>Lead Attorney</i> Texas State Bar No. 24041258 Jeffrey R. Swigart Texas Bar No. 24102553 VINSON & ELKINS L.L.P. 2001 Ross Avenue, Suite 3900 Dallas, TX 75201 Telephone: (210) 220-7700 Facsimile: (210) 220-7716 Email: eklein@velaw.com Email: jswigart@velaw.com</p> <p>Hilary L. Preston Texas State Bar No. 24062946 Erik Shallman Texas State Bar No. 24113474 Matthew J. Melancon Texas State Bar No. 24109544 VINSON & ELKINS L.L.P. 2801 Via Fortuna, Suite 200 Austin, TX 78746 Telephone: (512) 542-8400 Facsimile: (512) 542-8612 Email: hpreston@velaw.com Email: eshallman@velaw.com Email: mmelancon@velaw.com</p> <p>Abigail Lubow California State Bar No. 314396 VINSON & ELKINS L.L.P. 555 Mission Street, Suite 2000 San Francisco, CA 94105 Telephone: (415) 979-6963 Facsimile: (415) 358-5770 Email: alubow@velaw.com</p>	<p><u>/s/Aidan C. Skoyles (with permission)</u> James R. Barney (<i>pro hac vice</i>) james.barney@finnegan.com Qingyu Yin (<i>pro hac vice</i>) qingyu.yin@finnegan.com Aidan C. Skoyles (<i>pro hac vice</i>) aidan.skoyles@finnegan.com FINNEGAN LLP 901 New York Avenue N.W. Washington, DC 20001 Telephone: (202) 408-4000 Facsimile: (202) 408-4400</p> <p>Eric H. Findlay State Bar No. 00789886 Brian Craft State Bar No. 04972020 FINDLAY CRAFT, P.C. 102 N. College Ave., Ste. 900 Tyler, TX 75702 Telephone: (903) 534-1100 Facsimile: (903) 534-1137 efindlay@findlaycraft.com bcraft@findlaycraft.com</p> <p>ATTORNEYS FOR DEFENDANT TIANMA MICROELECTRONICS CO. LTD.</p>
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COUNSEL FOR PLAINTIFFS JAPAN DISPLAY INC. and PANASONIC LIQUID CRYSTAL DISPLAY CO., LTD.	
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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2021, a true and correct copy of the foregoing document was electronically filed in compliance with Local Rule CV-5(a) and was served on all counsel who are deemed to have consented to electronic service, per Local Rule CV-5(a)(3).

/s/ Erik Shallman

Erik Shallman

CERTIFICATE OF CONFERENCE

I hereby certify that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and that this motion is unopposed. The personal conference required by the Rule was conducted by e-mail and telephone on February 8, 9, and 10, 2021, between counsel for Plaintiffs (Erik Shallman) and counsel for Defendant (Aidan Skoyles).

/s/ Erik Shallman

Erik Shallman